



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Via Electronic Mail  
February 3, 2015

Mr. Fred J. Smalling  
Americas Styrenics  
605 Crenshaw Blvd  
Torrance, California 90503

**Re: Cleanup Verification Sampling and Analysis Plan – Train 4, Americas Styrenics 305  
Crenshaw Boulevard, Torrance California 90503.**

Dear Mr. Smalling

Thank you for working with the U.S. Environmental Protection Agency, Region 9 (USEPA) to address the cleanup of PCBs found on Americas Styrenics Train 4 (Site), located at 305 Crenshaw Blvd Torrance, California 90503. The USEPA received and reviewed Americas Styrenics December 2014 *Cleanup Verification Sampling and Analysis Plan – Train 4 (SAP)* prepared by Environmental Resource Management (ERM) which outlines Americas Styrenics Train 4 PCB cleanup verification strategy. Americas Styrenics verification plan includes approaches to sampling non-porous surfaces (i.e. metal jackets and vessel components), painted metal surfaces (i.e. hand rails, fall protection rails, and surfaces covered with fireproofing material), and porous surfaces (i.e. concrete foundation). Americas Styrenics SAP was prepared and submitted for USEPA approval in accordance with condition 10 of the USEPAs *Amendment 1 to the conditional approval of Self-Implementing Cleanup Plan – Train 4* dated March 18, 2014. USEPA is approving Americas Styrenics SAP as written in accordance with 40 CFR 761.61(c) risk based disposal.

This approval only applies to the Americas Styrenics Train 4 located on the facilities grounds at 305 Crenshaw Boulevard Torrance, California. This conditional approval does not relieve the owner, Americas Styrenics from complying with all other applicable federal, state, and local regulations and permits. All other applicable requirements and conditions in the original approval and subsequent amendments still apply. Departure from the approval conditions without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in this approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval.

USEPA appreciates the opportunity to assist Americas Styrenics on the PCB cleanup being approved here under 40 CFR 761.61(c). If you have any questions regarding this approval please contact George Randell at 415.972.3439. Thank you for your cooperation.

Sincerely,

A handwritten signature in purple ink, appearing to be 'George Randell', with a long horizontal line extending to the right.

George Randell, USEPA Region 9  
Land Division, RCRA Corrective Action

**Cc Via Electronic Mail Only**

Fred J. Smalling Americas Styrenics  
[FJSmalling@amstyrenics.com](mailto:FJSmalling@amstyrenics.com)

Jason Fernet  
[Jason.Fernet@erm.com](mailto:Jason.Fernet@erm.com)

Alex Cates ERM  
[Alex.Cates@erm.com](mailto:Alex.Cates@erm.com)

Blake Svendsen ERM  
[Blake.Svendsen@erm.com](mailto:Blake.Svendsen@erm.com)

Brian Couture ERM  
[Brian.Couture@erm.com](mailto:Brian.Couture@erm.com)